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TSCA PCB INSPECTION REPORT
BURLINGTON ENVIRONMENTAL INC. - GEORGETOWN FACILITY; SEATTLE, WA
(aka CHEMPRO - GEORGETOWN)
SEPTEMBER 30, 1991

MAILING ADDRESS:

Mr. David L. Aubry,
Plant Manager
Burlington Environmental, Inc. -
Chempro Division
Georgetown Facility
734 So. Lucile St.
Seattle, WA 98108

(206) 762-3362

SITE ADDRESS:

same

RECEIVED
JAN 14 1992
PESTICIDES & TOXIC SUBSTANCES
BRANCH - EPA REGION

INVESTIGATOR:

Peter Maule, State TSCA/PCB Officer, Toxics Clean-Up Program,
Washington Department of Ecology, NWRO (Ecology)

PREVIOUS TSCA ENFORCEMENT ACTIVITY/BACKGROUND:

This facility was targeted by EPA-X and Ecology as partial fulfillment of Ecology's required quota of "broker" inspections. EPA-X has a current, working file on this facility, per its permitting requirements.

COMMENCEMENT/INTRODUCTION:

A sign at the Lucile St. facility directs people to an administration office, half a block away. The office is within site, at the corner of Lucile St. and Airport Way (2203 Airport Way So., Suite 400, Seattle, WA 98134). I entered the administration facility at 0930 hrs, September 30, 1991. I showed my credentials to: Mr. David L. Aubry, Plant Manager; Mr. Ron Atwood, Division Manager - Puget Sound Operations; Peter K. Ressler, Senior Environmental Scientist; and Keith Lund Environmental Scientist. Mr. Aubry took the lead in dealing with me; he attended to the usual inspection forms. I did not give them a Receipt, however. I did not take delivery of the requested documents. They required some days to compile the documents, and I asked that they be sent directly to EPA-X, as soon as possible. Hence it was premature for me to deal with the Receipt, at the time. I understand that EPA-X has since received the documents.

FACILITY'S EXPLANATION:

They gave me the following explanation. The facility has 85 employees, including 25 "non-plant" employees in the administration office. All paints, oils, and other liquids are routinely tested for PCB's. Those found to be <500 ppm PCB's are solidified and sent to landfill at Arlington, OR. Those found to be >500 ppm PCB are sent to incineration at Rawlings (Arkansas?). They handle from 7 to 6000 barrels of all hazardous wastes per month, 50 to 80 of them being non-ballast PCB's.

RECORD REVIEW:

I showed them a list titled "REQUEST FOR INFORMATION (COMMERCIAL STORER) EPA TSCA INSPECTION", given to me a few days prior by Bill Hedgebeth of EPA-X in preparation for this specific "Broker" inspection. (See attachments.) They said item #1 (PCB Annual Document Log) was available, and was a large binder. Items #2 and #3 (manifests) were completely available. Item #4 (disposal documents) would be current through June, 1991. Item #5 was not applicable since the facility did not handle transformers. Regarding #6, inspections are conducted and recorded daily, not monthly per the list's requirements. I asked for six examples: two from September, 1990; two from April, 1991; and the two most recent ones. They said items #7, #8, and #9 were not applicable since there were no bulk tanks of PCB's. #10 was not applicable since there are no transformers. #11 was not applicable since they do not sell waste oil from the facility. #12 (local permits) was not applicable. Regarding #13, they did not know of any spills, but documents would reveal them; and if so, the records were available and would be sent. Regarding #14, the subcontracted transporters were Chempro's own "Resource Recovery", and "Custom Environmental" (Rawlings?). They said they would compile all these available documents in their entirety and send them directly to EPA-X's Bill Hedgebeth. They asked for copies of photos, which I agreed to send (but have not sent, per Bill Hedgebeth's later instructions).

INSPECTION TOUR:

We walked over to the facility. it is all one structure. Its setting is contiguous to a White Swan Sugar plant which has tall bulk tanks and makes Chempro's facility look bigger from the street than it really is. I took photos of the ML labeled front entryway. (See photos.) We walked into the room/area called "Lower Warehouse", (a separate area from the "Upper Warehouse" within the same structure, but separated by an elevated floor and interior walls). Here ML labeled barrels were neatly contained within large metal drip pans, and were being filled and/or

CHEMPRO - GEORGETOWN
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repacked with solidified materials, all ballasts it appeared. My camera failed here, hence there are no photos of here. The area was clean and orderly, without evidence of spills on the concrete floor or elsewhere.

I observed another room with an ML labeled, vault-like entry. Reportedly nothing is stored in this room, but it is described on their TSCA permit, and is available for special security requested items.


We then went to the "Upper Warehouse" area, used to store flammable mixed wastes. The operation reportedly is per the Seattle Fire Department's permit for inside storage of flammables. I saw about 25 ML labeled barrels neatly stacked on metal containment designed pallets. Reportedly these were double-packed barrels of household hazardous waste, awaiting imminent truck loading through an adjacent loading-dock door. The area was clean and orderly, without evidence of spills on the concrete floor, or elsewhere. Because of the available natural light, photos were achieved here. (see photos.)

CLOSING REMARKS:

I explained EPA-X's usual follow-up to a TSCA/PCB inspection. I thanked them for their assistance, then left the facility at 1145 hrs.

WRITTEN:

this report was originally written a few hours after completing the inspection. That report was lost however, apparently do to a computer storage mishap during an office move. This present report was written: 1130 hrs, January 11, 1992; Kirkland, Washington.



Peter A. Maule
WA. TSCA/PCB Officer

ATTACHMENTS:

5 photos
Notice of Inspection
Inspection Confidentiality Notice

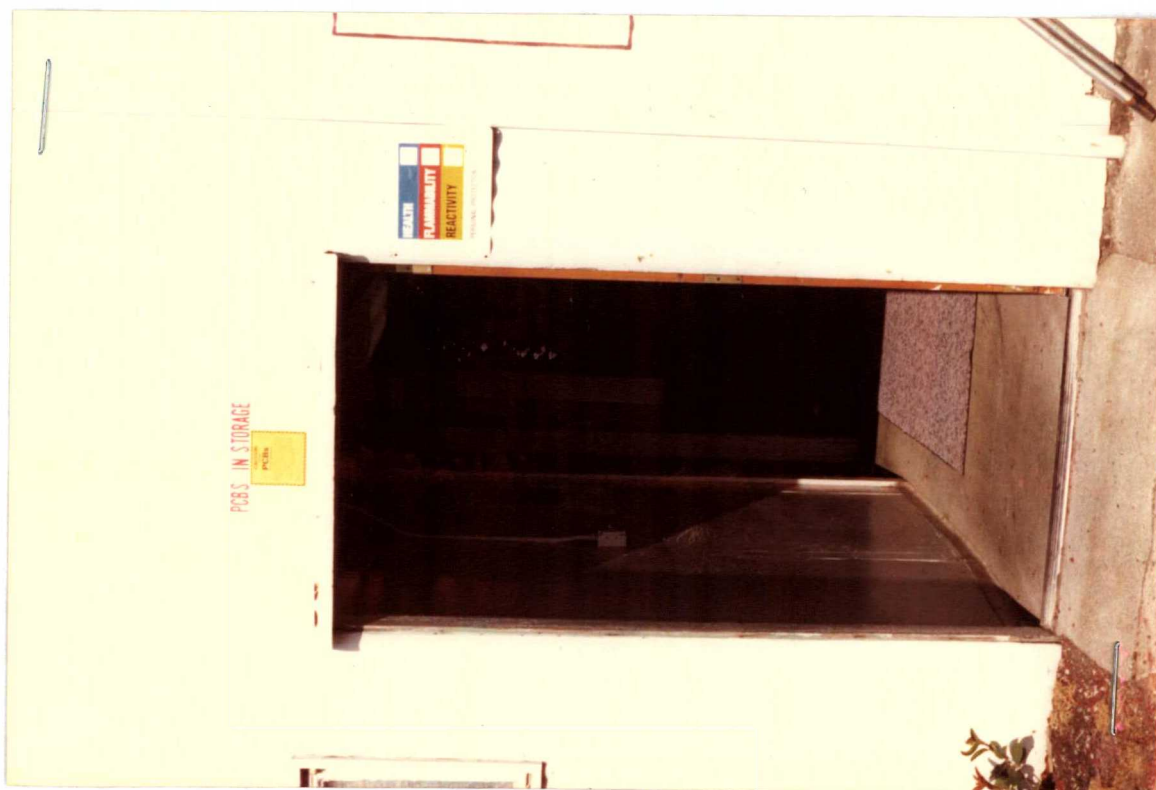
PM:pm

Photo 1



Entry into facility through perimeter fence .

Photo 2



Doorway into facility.

Photo 3



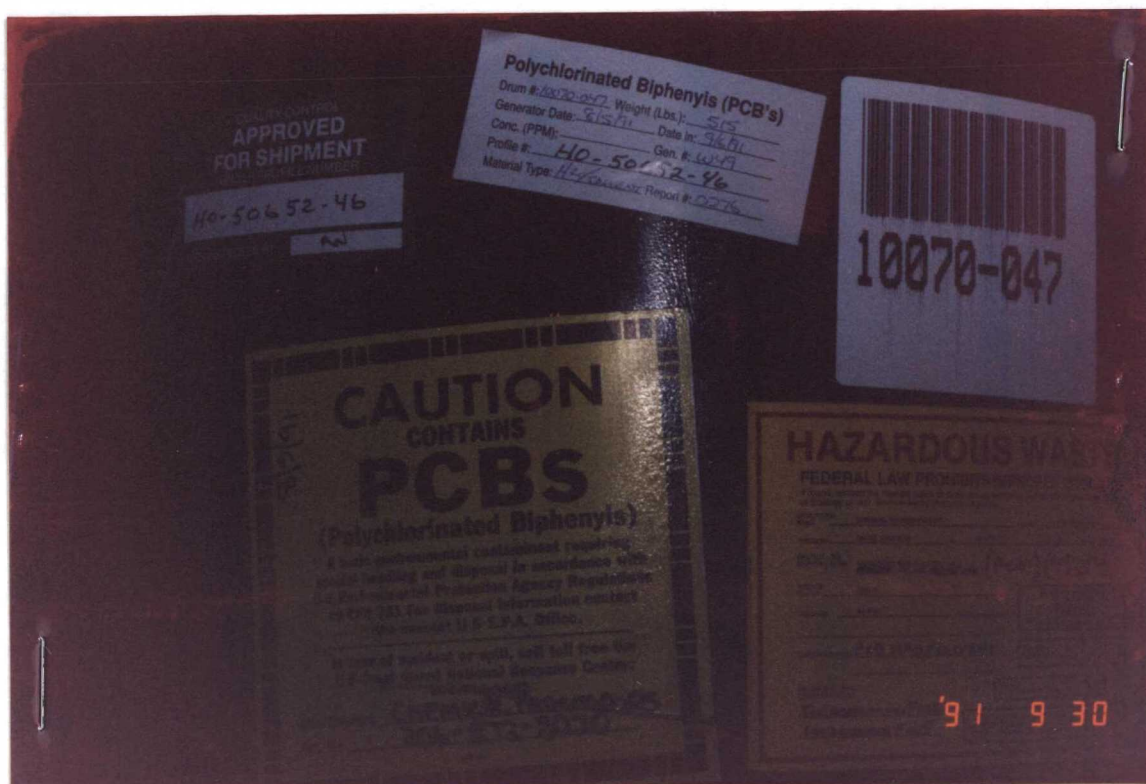
"Upper Warehouse Area", with barrels ready for truck loading. Closest barrel at right is detailed in following photo.

Photo 4



Detail of barrel in "Upper Warehouse" area.

Photo 5



Detail of another barrel in "Upper Warehouse" area.



ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 9/30/91	INSPECTOR NO. WA-003	DAILY SEQ. NO. (1)	10:00	Champro - Granger Facility
4. INSPECTOR ADDRESS WA. Dept. of Ecology - NWRS 3190 - 160th Ave, SE			5. FIRM ADDRESS 739 S. Lucile St. Seattle, WA 98108	

Bellevue, WA 98008-5452

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:



For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME Peter A. Marks		NAME David L. Aubrey	
TITLE TSCA/PCB Officer	DATE SIGNED 9/30/91	TITLE Plt. Mgr.	DATE SIGNED 9/30/91



U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 9/30/91	INSPECTOR NO. WA-003	DAILY SEQ. NO. (13)	Champro - Gig Harbor Facility
3. INSPECTOR NAME Peter A. Mauls			4. FIRM ADDRESS 234 South Lucia, St. Seattle, WA 98108
5. INSPECTOR ADDRESS WA. Dept. of Ecology - NWRO 3190-160th Ave. SE. Bellevue, WA 98008-5452			6. CHIEF EXECUTIVE OFFICER NAME John Craig
			7. TITLE President

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice

SIGNATURE

NAME

TITLE

DATE SIGNED

NAME

TITLE

ADDRESS

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.